

MSG

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

Rodrick Bray Boy

17 - 4371

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Michael Gormely,
Captain, Captain Adam
Friedman, Captain Anthony Luca
Director John Cooper

Amended
COMPLAINT

Jury Trial: G Yes G No

(check one)

FILED

JAN 09 2018

By Dep. Clerk

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	Rodrick Bray Boy
	Street Address	2600 Southampton Road
	County, City	Phila, Phila
	State & Zip Code	Pennsylvania, 19116
	Telephone Number	215-688-8642

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Captain, Michael Gormley
Street Address 1701 Bowler St
County, City Phila ~~PA 19115~~ Phila
State & Zip Code Pennsylvania, 19115

Defendant No. 2

Name Captain Adam Friedman
Street Address Academy Rd and Redlion Rd
County, City Phila, Phila
State & Zip Code Pennsylvania, 19154

Defendant No. 3

Name Captain Anthony Luca
Street Address 2831 Levick St
County, City Phila, Phila
State & Zip Code Pennsylvania, 19149

Defendant No. 4

Name Director John Cooper
Street Address 2600 Southampton Road
County, City Phila, Phila
State & Zip Code Pennsylvania, 19116

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions

☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue?

Violations of my 4th and 14th amendment right
Equal Protections of the laws, illegal Search and
Seizure.

Facts

- ON 12/18/17 I Observed two officers in the front Entrance Parking lot. One of the officers wore a plain Police uniform, and the other officer had on a white lieutenant shirt on. When I looked at the officers as I was leaving the building they looked at me with a grimaced look.
2. When I returned to the building ON 12/18/17 between 3:00^{pm} - 4:00^{pm} I was receiving strange behavior from staff and inmates. They ~~are~~ were giving me frustrated looks, as if they were informed of something.
3. On the Week of Christmas I was in my room and a inmate Screamed Out that, He's in there watching Pornography On his phone.
4. Also after the officers visit on 12/18/17 and before, I seen Philadelphia Police follow me from Southampton Road and the Roosevelt Blvd all the way to Frankford transportation stop. Different Cars Popped Out as the 14 Bus Drove Down Roosevelt Blvd. This informed me of that I was being followed by several Police District. The 7th, 8th, 15th District who Patrols Roosevelt Blvd.
5. ON 12/18/17 there must have been a meeting with officers and Director Cooper, and staff about the contents ON my Phone of some sort. Director Cooper and staff at the Self Help Movement, Then is telling inmates about whatever is being told to them by these officers to inmates hoping that harm comes to me or in other words provoke the harm.
6. Being as though Director Cooper and staff have access to information about me, my family's address, the time frame ~~in~~ in which I come and go I could easily be targeted. Also these above Police District could let this happen.

Facts

⑦ Depending on what the Device these officers are using in which I think they are using a stingray to track my location, observe my Phone Content and listen to my Phone Conversations. With this Device the Uncover any Job Im trying to Pursue and Sabotage my Employment. In Order to use this Device you have to be a Certain distance to retrieve a Signal from my Phone. I believe when Im in the building at Self Help Movement located ~~at~~ at Southampton Road and Roosevelt Blvd Police District #7 Monitors my Phone. When Im at my Mothers in Upper Darby PA Upper Darby Police Monitors my Phone. They either have multiple Devices or there sharing the Device Once they Pinpoint my location.

⑧ I do believe that Police Districts 7th, 8th, 15th along with Director Cooper and my Counselor Pat Crosson who I currently have a Civil Suit against, and Self Help staff are conspiring to harm me in some type of way.

⑨ Around the January 2, 2018 I submitted a homeplan to my Mothers address and I also submitted a furlough Pass to my mothers, after they was taken for no apparent good reason.

⑩ ~~On Dec 27th 2017~~ On Dec 27th 2017 I spoke with Ms. Braswell from the Board of Probation and Parole, asking why was I not allowed a furlough he explained to me that the address I went to for 7 months on ~~furloughs~~ was Denied for a Homeplan 18 months ago, I then stated it was not Denied it was withdrawn.

⑪ Ms. Braswell then stated to me that if I put in a Homeplan to my Mother address I then can receive my ~~Homeplan~~ furloughs again.

⑫ Also on Dec 27th 2017 I contacted Zakia Johnson informing her of the Problems I was having with Parole about my furloughs. I explained to her about ~~the~~ why they said they was not giving them to me. Ms. Zakia Johnson told Me she would have ~~the~~ ~~the~~ Mr. Randy ~~the~~ suffer Contact me about it.

⑬ Mr. Randy lauffer Called me on Jan 3rd 2018 and We Went over the issues I ~~was~~ having with not receiving a furlough he asked Some questions and told me he would get Back to me.

⑭ Ever since I spoke With Mr. Randy lauffer I have not received my furloughs Or have I been able to get in Contact With Mr. lauffer or Zaki a Johnson, My Parole agent Colli or Ms. Braswell, No one from Parole or the Department of Corrections.

⑮ Im Currently being targeted By the Self Help Movement staff they have been sneaking in my room from Jan 2nd 2018 to Jan 8th 2018 Between the hours of 3:00^{PM} to 10:00^{PM} look throug my legal Documents and Just Searching while Im Not there.

Legal Claims

⑯ ~~●~~ Pertaining to Paragraphs 1 - 8 I reallege that the above Police Officials Violated my 14th amendment right By Not Providing Me With equal Protections of the laws. They also Violated my 4th amendment right under illegal Search and Seizure by illegally Monitoring my Phone.

⑰ Pertaining to Paragraphs 1- 8 I re-allege Director Cooper, Pat Crosson have Violated my 14th amendment right to equal Protection of the laws and also my 8th amendment right to Cruel and unusual Punishment.

⑱ Pertaining to Paragraphs 9 - 15 I reallege that Zaki a Johnson, Randy lauffer, Patt crosson Ms. Braxwell, ~~Director~~ Director Cooper Violated my 14th amendment right to equal Protections of the laws by showing Discrimination, they also Violated my 4th amendment right to illegal Search and Seizure and also Violates there Own Policy's.

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. Public Humiliation

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

I would like to Move Out of the Custody of the Department of Corrections While Im in the process of Pursuing My Civil Suit fear of Retaliation, and anything else considered reasonable.

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? Self Help ~~Mate~~ Move
ment

B. What date and approximate time did the events giving rise to your claim(s) occur? 8:00 am
12/18/17

C. Facts: _____

What
happened
to you?

Who did
what?

Was
anyone
else
involved?

Who else
saw what
happened?

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 8 day of January, 2018.

Signature of Plaintiff Rodrick Brayley

Mailing Address 2600 Southampton Road

Telephone Number 215-688-8642

Fax Number (if you have one) _____

E-mail Address Rodrick.Brayley

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this 8 day of January, 2018 I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: Rodrick Brayley

Inmate Number K11877